

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION

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TRACEY CORDES, CLERK
U.S. DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
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JOAN GREEN,

Plaintiff,

Hon.

v

File No. 2:10-cv-

BIOLIFE PLASMA SERVICES, L.P.,

Defendant

2:10-cv-328

Gordon J. Quist, U.S. District Judge

Jonny L. Waara (P55525)
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W. John Stenton (P33467)
Garan Lucow Miller, P.C.
Attorney for Defendant
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NOTICE OF REMOVAL

PLEASE TAKE NOTICE that defendant, Biolife Plasma Services, L.P., by their attorneys, Garan Lucow Miller, P.C., hereby remove this action from the Circuit Court for the 25th Judicial Circuit Court, County of Marquette, Michigan, to the United States District Court for the Western District of Michigan, Northern Division, pursuant to 28 U.S.C. §§1332, 1441, and 1446. The grounds for removal are:

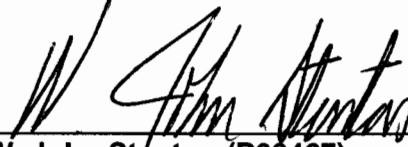
1. The plaintiff avers in her Complaint that she is a resident of the City of Marquette, Marquette County, Michigan. On information and belief, defendant states that plaintiff is a citizen of the State of Michigan.
2. Plaintiff's Complaint further asserts that defendant Biolife Plasma Services, L.P. is a foreign limited partnership headquartered in Philadelphia, Pennsylvania.
3. That in fact the defendant Biolife Plasma Services, L.P. is a foreign limited partnership organized under the laws of the State of Pennsylvania, with its corporate headquarters located in Philadelphia, Pennsylvania.
4. Diversity of citizenship thus exists between the plaintiff and the defendant.
5. This matter, involves alleged damages for pain and suffering, mental and emotional anguish, limitations and restrictions, loss of services, loss of income, and/or impaired earning capacity and medical expenses, and the amount in controversy is in excess of seventy-five thousand dollars (\$75,000).

A Notice of Filing of Notice of Removal, with a copy of this Notice of Removal attached, will promptly be filed with the Clerk for the Circuit Court for the County of Marquette, Michigan.

WHEREFORE, defendant Biolife Plasma Services, L.P., hereby requests that this action be removed from the 25th Judicial Circuit Court, County of Marquette, Michigan, to the United States District Court for the Western District of Michigan, Northern Division pursuant to 28 U.S.C. §§1332, 1441, and 1446.

GARAN LUCOW MILLER, P.C.

Attorneys for Defendant

A handwritten signature in black ink, appearing to read 'W. John Stenton', is written over a horizontal line.

W. John Stenton (P33467)

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Date: November 24, 2010